



FACSIMILE COVER SHEET

Date: 5 March No. of Pages (including cover): 3

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ADMIN RECORD

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KAISER - HILL
COMPANY

INTEROFFICE MEMORANDUM

DATE: March 5, 1997

TO: Wayne Sproles, Mound Site Project Manager, X5790

FROM: Carol Patnoe, K-H/Air Quality Management, Bldg. T130C, X2440

SUBJECT: MOUND SITE OPERATIONS: UNANTICIPATED CONDITIONS INVOLVING VOLATILE ORGANIC COMPOUNDS AND AIR EMISSION REPORTING

Reference: Proposed Action Memorandum for the Source Removal at the Mound Site IHSS 113, RF/RMRS-96-0059, February 1997.
Site Specific Health and Safety Plan (HSP), Source Removal at the Mound Site, RF/RMS-96 0061, Draft.
Field Implementation Plan (FIP) for the Source Removal at the Mound Site IHSS, February 1997, Draft.

Air Quality Management (AQM) has been requested to describe appropriate actions for handling unanticipated conditions or hazards associated with volatile organic compounds (VOCs) encountered during Mound remediation operations. Appropriate actions need to be identified which address the situation from the perspective of the state and federal air statutes and regulations, that is, the protection of public health and the environment as opposed to worker/collocated worker health and safety.

Documented Project Information Concerning Unanticipated Hazards

The site specific HSP, developed by your organization, provides guidance for handling unanticipated hazards. Specifically, Section 7.7 describes the actions to be taken to interrupt operations when unanticipated conditions are encountered.

"...project activities will pause to assess the potential hazard or condition. The potential hazard or condition will be evaluated to determine the severity or significance of the hazard or condition and whether the controls on the project are sufficient to address the hazard or condition. Based on this initial evaluation, a determination will be made whether to proceed with controls currently in place, segregate the hazard or condition ..., or curtail operations to address the unexpected hazard or condition. Concurrence to proceed down the selected path must be obtained from the RMRS Vice President...."

Unanticipated hazards or conditions concerning VOC emissions are identified during perimeter VOC air monitoring conducted at both the excavation and the thermal treatment unit; by observation of free organic material, and by encountering non-natural debris allied with volatile organic material (drums). The Facility Implementation Plan (FIP) requires that AQM be appropriately notified to review and re-assess operations when there is a potential for a significant increase in air pollutant emissions (Checklist for Restart of Mound Operations).

Actions for Control of VOC Emissions

Colorado Air Quality Control Commission Regulation No. 7 (Reg 7), regulates sources of VOC emissions. The provisions of this regulation (Reg 7.V.A) prohibit the disposal of VOCs by evaporation unless reasonable available control technology (RACT) is utilized. Appropriate control technologies for this type of remediation (excavation and thermal treatment) involve covers and physical barriers, enclosures, wind barriers, water sprays, temporary/long term foams, and operational controls. Operational controls include controlling the rate of excavation, the amount of contaminated soil area that is exposed, and the duration that soil piles are left uncovered.

Regulatory Reporting Requirement for Increased Emissions

The provisions of Colorado Air Quality Control Commission Regulation No. 3 (Reg 3) set forth requirements for Air Pollutant Emission Notices (APENs), Construction Permits, and Operating Permits. Because the remediation of the Mound site is regulated under CERCLA, air permits are not required. However, remediation operations are subject to APEN requirements and an APEN was submitted to the Colorado Department of Public Health and Environment, Air Pollution Control Division (CDPHE, APCD) in February 1997 for both VOC and hazardous air emissions (Reg 3.II.C.1-2). If there is a significant change in emissions above the reported values due to unanticipated conditions, a revised APEN must be submitted to the state. Reg 3 provides the following:

- Significant change for any non-criteria reportable pollutant (hazardous) occurs if the emissions increase by 50% or 5 tons per year, whichever is less, above the level reported on the last APEN.
- Significant change for any criteria pollutant (VOCs) occurs if the emissions increase by 5% or 1 ton, whichever is less, above the level reported on the last APEN.
- Revised APENs need to be submitted to the CDPHE, APCD by April 30 of each year.

If you need additional assistance or have any questions concerning the above information, please contact me.

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